

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

CHRIS ALLEN STONECIPHER, individually, NO. _____

Plaintiff,

vs.

UNITED STATES POSTAL SERVICE;
SARAH FICKBONE, an employee and/or
agent of THE UNITED STATES POSTAL
SERVICE, and SARAH FICKBONE and
“JOHN DOE” FINCKBONE individually and
as a marital community comprised thereof.

Defendants.

COMPLAINT FOR DAMAGES

COMPLAINT

COMES NOW the Plaintiff, CHRIS ALLEN STONECIPHER, by and through Plaintiff's attorney, Janelle N. Bailey of Washington Injury Law, and complains and alleges against the above-named defendants as follows:

I. PARTIES

1.1 Plaintiff, Chris Stonecipher, is a resident of Concrete, Skagit County, Washington, and resided in Skagit County at all times relevant and material to this complaint.

1.2 Defendant, United States Postal Service, is an agency of the United States Government and operates in Skagit County, Washington.

1.3 Defendant, Sarah J. Finckbone, is an employee and/or agent of the United States Postal Service. Upon information and belief, Defendant Sarah Finckbone is a resident of Concrete, Skagit County, Washington, and resided in Concrete, Skagit County, Washington at all times relevant and material to this complaint.

1.4 Defendant, "John Doe" Finckbone, is a resident of Concrete, Skagit County, Washington, and resided in Concrete, Skagit County, Washington at all times relevant and material to this complaint.

II. JURISDICTION AND VENUE

2.1 Plaintiff, Chris Allen Stonecipher was at all times relevant and material to this complaint a resident of Skagit County, Washington.

2.2 Defendant, United States Postal Service was at all times relevant and material to this complaint an agency of the United States Government and operating in Skagit County, Washington.

2.3 Defendant, Sarah J. Finckbone was at all times relevant and material to this complaint a resident of Skagit County, Washington.

2.4 Defendant, "John Doe" Finckbone was at all times relevant and material to this complaint, a resident of Skagit County, Washington.

2.5 Jurisdiction and venue are proper for Defendant United States Postal Service under U.S.C., Title 28, §1339.

2.6 Jurisdiction and venue are proper for Defendants Sarah J. Finckbone and “John Doe” Finckbone under U.S.C., Title 28, §1367.

III. FACTS

3.1 Date: Plaintiff Chris Stonecipher’s injuries arise out of an automobile collision that occurred on October 15th, 2020.

3.2 Location: The collision occurred in Concrete, Skagit County, Washington on October 15th, 2020.

3.3 Details: On October 15th, 2020, Chris Stonecipher was travelling eastbound on South Skagit Highway in Concrete, Skagit County, Washington. A mail truck, owned by Defendant United States Postal Service pulled out onto South Skagit Highway from the shoulder of the roadway by Defendant Sarah J. Finckbone. Defendant Sarah J. Finckbone failed to yield the right of way and collided with the side of Plaintiff’s vehicle.

IV. CAUSE OF ACTION – NEGLIGENCE

4.1 Duty: Defendants United States Postal Service and Sarah J. Finckbone through common law, statute, regulation and/or ordinance owed Plaintiff a duty to drive attentively, and to otherwise exercise ordinary and reasonable care while operating a vehicle within the State of Washington. This duty included a duty to obey all relevant rules of the road pursuant to RCW 46.61 et seq.

4.2 Breach: Defendants United States Postal Service and Sarah J. Finckbone breached their duties as set forth in paragraphs 3.3 and 4.1.

4.3 Proximate Cause and Harm: As a direct and proximate cause of Defendants’ breach of their duties as set forth in paragraphs 4.1 and 4.2, Plaintiff Chris Stonecipher has

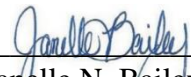
1 suffered damage to his vehicle as well as personal injuries, including but not limited to,
2 injuries to his hips, back, and legs.

3 **V. PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiffs pray for judgment against the Defendants, and each of them, as
5 follows;

- 6 1. For judgment against the Defendants, and each of them, in an amount of \$1,000,000.00 for
7 Plaintiff's physical injuries sustained as a result of this collision;
8
9 2. For Plaintiff's costs and reasonable attorney's fees, or in the alternative, for statutory attorney
10 fees in the amount of \$125.00; and
11
12 3. Any and all other relief the Court finds just and equitable.

13 Respectfully Submitted,

14 

15 Janelle N. Bailey

16 **WASHINGTON INJURY LAW**

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